

**United States Bankruptcy Court**  
**Middle District of Pennsylvania**

In re: Robert J Donmoyer, Jr.  
Felisha Donmoyer

Case No.: 1:21-bk-00143  
Chapter: 7

Debtor

Address: 43 Stonehill Park  
Annville, PA 17003  
Employer's Tax Identification (EIN) No(s): \_\_\_\_\_  
Last four digits of Social Security No(s) : xxx-xx-3575 & xxx-xx-2015

**Objection to Dismissal of Petition**

AND NOW, comes the above named Debtors, by and through their counsel, R. Scot Feeman, Esquire, and files this Objection to Dismissal of Petition, the following being a statement thereof:

1. On January 25, 2021, the above named Debtors filed a Chapter 7 bankruptcy petitions with this Court.
2. A Meeting of Creditors was scheduled for March 22, 2021 at 8:30 a.m. by telephone conference before Trustee Leon P. Haller, Esquire.
3. On March 18, 2021, Counsel for the Debtors' was advised that a criminal case that he was attached too was selected for trial during the week of March 22, 2021, with jury selection to commence that morning.
4. On March 19, 2021, Counsel's office filed a continuance request citing his unavailability for the Meeting of Creditors.
5. The Meeting of Creditors was then rescheduled for April 5, 2021 at 8:30 a.m. by telephone conference before Trustee Leon P. Haller, Esquire.
6. Said notification was not listed on Counsel for the Debtors' calendar and notification to the Debtors was not sent from his office to his clients.
7. Do the that oversight, both Counsel for the Debtors and the Debtors themselves were not in attendance for the Trustee's meeting commencing on April 5, 2021 at 8:30 a.m..
8. It would be manifestly unjust to dismiss the Debtors' petition as their non-appearance on April 8th was no fault of their own, but counsel's for not having the meeting scheduled and not providing notice to the Debtors of the stated meeting.

Wherefore, the Debtors, Robert J. Donmoyer, Jr. and Felisha Donmoyer respectfully request that this matter not be dismissed but rather relisted for a Meeting of Creditors before Trustee Leon P. Haller, Esquire.

Date April 19, 2021

Signature /s/ R. Scot Feeman  
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